

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS,	:	NO. 2:19-cv-05030-JDW
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
THE MIDDLE EAST FORUM, et al.	:	
	:	
Defendant.	:	
	:	

**MOTION FOR EXTENTION OF 1 DAY TO RESPOND TO DISPOSITIVE MOTIONS**

Plaintiff, Lisa Reynolds-Barbounis hereby moves the Court for an extension of one (1) day to respond to dispositive motions.

1. Plaintiff and Defendants filed respective motions for summary judgment on March 1, 2021.
2. On March 13, 2021, an Order was issued pursuant to a request by the parties that responses to dispositive motions shall be filed on or before April 9, 2021.
3. The honorable then granted a motion for an extension so that currently responses to dispositive motions are currently due today, Friday, April 16, 2021.
4. Plaintiff has informed Defendants regarding this request. Defendants have not responded.
5. Plaintiff makes this request pursuant to the lengthy motion and fact statement offered by Defendants.
6. Plaintiff seeks this extension to finalize her response to Defendants' Motion for Summary Judgment.

7. Plaintiff is finished all substantive writing and requests this extension to Saturday, in order to finish adding all relevant citations.

8. Defendants presented a fifty-page fact statement with almost 400 paragraphs. It was an extremely lengthy process to add all citations to Plaintiff's response to Defendant's fact statement.

9. Should the Court grant this request, Plaintiff will file her response over the weekend and before Monday.

**WHEREFORE**, Plaintiff respectfully requests that the Court grant Plaintiff's Motion for a extension of one (1) day to for the parties to file responses to dispositive motions.

BY: /s/ Seth D. Carson  
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Counsel for Plaintiff

DATED: April 16, 2021

**CERTIFICATE OF SERVICE**

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Motion to be served via ECF.

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DATED: April 16, 2021